

EXHIBIT 1

From: [Muneer Ahmad](#)
To: [Pezzi, Stephen \(CIV\)](#); [Rosenberg, Brad \(CIV\)](#); [Westmoreland, Rachael \(CIV\)](#); [Thorp, Galen \(CIV\)](#); [Marutollo, Joseph \(USANYE\)](#)
Cc: [Trudy Rebert](#); [Mayra Joachin](#); [Araceli Martínez-Olguin](#); [Paige Austin](#); [Karen Tumlin](#); [Dasgupta, Anisha](#); [batallavidal_iso@mailman.yale.edu](#); [Finkelstein, Alex](#); [Chien, Marsha \(ATG\)](#); [Taylor, Abigail \(AGO\)](#); [Nogueira, Daniela](#); [Khan, Sania](#); [Colangelo, Matthew](#)
Subject: Re: [Batallavidal_Iso] Proposed schedule -- Batalla Vidal v. Wolf (16-cv-4756) and State of New York v. Trump (17-cv-5228)
Date: Thursday, August 13, 2020 10:04:44 AM
Attachments: [BV Proposed Briefing Schedule\[2\].docx](#)

Apologies for the second message. I am adding our State plaintiff colleagues, who were not on the original distribution list.

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From: BatallaVidal_LSO <batallavidal_iso-bounces@mailman.yale.edu> on behalf of Muneer Ahmad <muneer.ahmad@ylsclinics.org>

Date: Thursday, August 13, 2020 at 8:56 AM

To: "Pezzi, Stephen (CIV)" <Stephen.Pezzi@usdoj.gov>, "Rosenberg, Brad (CIV)" <Brad.Rosenberg@usdoj.gov>, "Westmoreland, Rachael (CIV)" <Rachael.Westmoreland@usdoj.gov>, "galen.thorp_usdoj.gov" <galen.thorp@usdoj.gov>, "Marutollo, Joseph (USANYE)" <Joseph.Marutollo@usdoj.gov>

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Subject: [Batallavidal_Iso] Proposed schedule -- Batalla Vidal v. Wolf (16-cv-4756) and State of New York v. Trump (17-cv-5228)

Dear Counsel,

Attached please find a proposed schedule in the above-referenced cases, made jointly by the *Batalla Vidal* and *State of New York* plaintiffs. We would appreciate your views on this schedule in advance of this afternoon's hearing. If it would be helpful to speak by phone, please let us know.

Best wishes,
Muneer Ahmad

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Plaintiffs' Proposed Schedule - *Batalla Vidal v. Wolf* (16-cv-4756) and *State of New York v. Trump* (17-cv-5228)

8/13	Status Conference/PMC
9/10 (28 days)	(1) Plaintiffs' Amended Complaints (2) BV Plaintiffs' Motion for Class Certification (3) Plaintiffs' Motion for Partial Summary Judgment
9/21 (11 days from amended complaints)	Government Production of Administrative Record (AR)
10/5 (14 days from production of AR)	Following conferral with Government, Plaintiffs' motion, if necessary, to complete AR and/or compel extra-record discovery
10/12 (7 days)	Government Opposition to Plaintiffs' motion re. AR/extra-record discovery (if any)
10/8 (28 days from amended complaints)	(1) Government answers/Motion to Dismiss (2) Government Opposition to BV Class Certification motion (3) Government Opposition to Partial SJ/Government Cross-Motion for SJ
10/29 (21 days)	(1) Plaintiffs' Opposition to MTD (2) BV Plaintiffs' Reply on Class Certification (3) Plaintiffs' Reply/Plaintiffs' Opposition to SJ
11/19 (21 days)	(1) Government Reply to MTD (2) Government Reply to Cross-Motion on SJ